

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>In re:</b>	:
	: <b>Case No.: 20-13076</b>
<b>Keith B Kratzke</b>	: <b>Chapter 13</b>
<b>Janet C Kratzke</b>	: <b>Judge Eric L. Frank</b>
<b>Debtor(s)</b>	: <b>*****</b>

**OBJECTION OF WELLS FARGO BANK, N.A. TO CONFIRMATION OF THE  
AMENDED PLAN (DOCKET NUMBER 33)**

Wells Fargo Bank, N.A. ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed Amended Chapter 13 Plan ("Plan") filed by Keith B Kratzke and Janet C Kratzke (collectively, "Debtor") as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor's property commonly known as 379 Pine Run Rd., Doylestown, PA 18901 ("Property").
2. Creditor has filed Proof of Claim number 6 in the amount of \$98,186.25.
3. Debtor's Plan references a Stipulation between Debtor and Creditor to address Creditor's claim, while to date no Stipulation has been filed. Specifically, the plan states that the stipulation allows debtor to pay Creditor's claim, which has matured, over 15 years with 0% interest. As no stipulation has been filed, this plan provision is false.
4. In addition, Creditor requests that Debtor's Plan specify that the underlying debt will not be subject to discharge.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Amended Plan.

Respectfully submitted,

/s/ Sarah E. Barngrover  
Sarah E. Barngrover, Esquire (323972)

Adam B. Hall (323867)  
Manley Deas Kochalski LLC  
P.O. Box 165028  
Columbus, OH 43216-5028  
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Attorneys for Creditor  
The case attorney for this file is Sarah E.  
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**In re:** :  
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**Janet C Kratzke** : **Judge Eric L. Frank**  
**Debtor(s)** : \* \* \* \* \*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Objection of Wells Fargo Bank, N.A. to the Confirmation of the Amended Plan was served on the parties listed below via e-mail notification:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

William C. Miller, Esq., Chapter 13 Trustee, P.O. Box 1229, Philadelphia, PA 19105,  
ecfemails@ph13trustee.com

Brad J. Sadek, Attorney for Keith B Kratzke and Janet C Kratzke, Sadek and Cooper, 1315 Walnut Street, Suite 502, Philadelphia, PA 19107, brad@sadeklaw.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on March 10, 2021:

Keith B Kratzke and Janet C Kratzke, 379 Pine Run Road, Doylestown, PA 18901

Keith B Kratzke and Janet C Kratzke, 379 PineRun Rd, Doylestown, PA 18901

Pennsylvania Department of Revenue, 110 N 8th St STE 204, Philadelphia, PA 19107

Pennymac Loan Services, Attn: Bankruptcy, P.O. Box 514357, Los Angeles, CA 90051

DATE: March 10, 2021

/s/ Sarah E. Barngrover  
Sarah E. Barngrover, Esquire (323972)  
Adam B. Hall (323867)  
Manley Deas Kochalski LLC  
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Attorneys for Creditor

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